

June 5, 2000

CCN 00-009029

Mr. Brian R. Monson
Idaho Division of Environmental Quality
1410 North Hilton
Boise, ID 83706-1255

**POSITION ON NO LONGER CONTAINED-IN REQUIREMENTS FOR THREE NEW WELLS AT
TEST AREA NORTH (TAN), OPERABLE UNIT 1-07B - DE-AC07-991D1327**


Dear Mr. Monson:

As discussed during a recent Waste Area Group (WAG) 1 Operable Unit 1-07B conference call between Bechtel BWXT Idaho, LLC WAG 1 representatives, and Mr. Mark Jeffers on May 4, 2000, this letter documents the direction from Mr. Jeffers to not generate a No Longer Contained-In (NLCI) determination for the installation of three newly proposed monitoring wells.

The proposed drilling locations for monitoring wells identified as PM-1, PM-2, and PNA-1 are outside the 5 parts per billion (ppb) boundary of the TAN plume as defined in the Explanation of Significant Differences dated November 1997. The 5 ppb boundary does not delineate the areal extent of listed waste contamination. It does establish where Comprehensive Environmental Response, Compensation and Liability Act remedial action is required. Modeling predicts that Trichloroethylene concentrations at these three well sites will be 0.1 ppb or less, below the common laboratory detection limit of 0.2 ppb. Thus drilling activities will not advance into the F001 listed hazardous waste plume and a NLCI determination will not be required. Drill cuttings from the saturated zone as well as drilling water and purge water from these three wells will not be managed as contaminated with listed waste.

If you have any questions, please contact me at (208) 526-4704 or Mr. David Wessman, DOE-ID, at (208) 526-0082.

Sincerely,



Ronald H. Guymon, Director
Environmental Affairs

JPS:np

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cc: R. E. Bullock, DEQ

M. Jeffers, DEQ

D. L. Korkukluoglu, BBWI, MS 3528

R. M. Shaw, DOE-ID, MS 1117

D. L. Wessman, DOE-ID, MS 1146 DW 6-6-00

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bcc: J. M. Connolly, MS 3428
D. J. Kuhns, MS 3921
R. A. Montgomery, MS 3428
L. N. Peterson, MS 3921
S. L. Reno, MS 3915 *SLR 6/6/00*
J. S. Rothermel, MS 3921
J. E. Rugg, MS 3428
J. J. Saye, MS 3428 *JS 6/6/00*
J. P. Shea, MS 3915 *JS 6/6/00*
F. L. Smith, MS 3940
ARDC, MS 3922
Correspondence Control Center, MS 3601
R. H. Guymon File (RHG-83-00)

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Disposition Authority: ENV1-K-1

Retention Schedule: Pending